

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

**UNITED STATES OF AMERICA**

**V.**

**ROBERT REYNOLDS**

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**CASE NO: 1:06-CR-124-WHA**

**UNOPPOSED MOTION FOR AMENDMENT OF CONDITIONS OF RELEASE**

**COMES NOW** the Defendant, Robert Reynolds (“Mr. Reynolds”), by undersigned counsel, pursuant to 18 U.S.C. §3145 (a)(2), and respectfully requests that this Court amend the conditions of Mr. Reynolds’ release, to the extent those restrictions prohibit his travel outside the Middle District of Alabama even with his probation officer’s approval.

In support of this motion, the Defendant would show the following:

1. On May 2, 2006, Mr. Reynolds was indicted for possession of unauthorized copies of copyrighted music and movies in a commercial setting. According to the discovery, while being interrogated by federal agents during the search of Mr. Reynolds’ music store, Mr. Reynolds indicated that he had received some of the unauthorized copies via telephone orders and mail shipments from distributors in Atlanta and New York.

2. A restriction limiting Mr. Reynolds’ travel to the Middle District of Alabama was attached to his appearance bond, filed with this Court on May 9, 2006.

3. 18 U.S.C. §3142 (c)(1)(B) provides for the pretrial release of a person “subject to the **least restrictive** further condition, or combination of conditions, that such judicial officer determines will reasonably assure the appearance of the person as required . . . .” (2006) (emphasis added).

4. Mr. Reynolds lives in Ozark, Alabama and has life-long ties to that community. He was born and raised there, and his mother, siblings, wife, close friends, and in-laws all currently live

there. In addition, Mr. Reynold's has lived and worked in Ozark off and on over a period of forty years.

5. Mr. Reynolds' current employment consists of washing windows for commercial buildings via his own business, Redd's Window Washing. This business is licensed and insured; Mr. Reynolds began its operation in April 2006.

6. In an effort to increase his earning potential, Mr. Reynolds would like to promote and offer his window washing services to commercial businesses in a greater geographical area, outside of Ozark. Since Ozark is located in the southeastern corner of Alabama, additional sources of business for Mr. Reynolds will be along the Alabama-Florida state line, and west to Mobile.

7. Mr. Reynolds would also like to attend an upcoming family reunion in Mobile, Alabama and Biloxi, Mississippi, scheduled for August 11-13, 2006. The activities planned for his family reunion will take place in both Mobile and in Biloxi, Mississippi.

8. Mr. Reynolds' probation officer, Mr. Buddy Johns is aware of these requests and has no objection to Mr. Reynolds promoting his business beyond the Middle District of Alabama, or to Mr. Reynolds attendance at his family reunion, or to the removal of the travel restriction. However, the current travel restriction on Mr. Reynolds' bond prevents Mr. Johns from granting his permission to Mr. Reynolds to engage in these activities.

9. Mr. Reynolds is aware that even without a travel restriction, he would be required to continue his regular reports to Mr. Johns, to respond to requests from Mr. Johns, and to regularly confer with Mr. Johns and notify him of any travel overnight.

10. Thus, undersigned counsel respectfully requests that the conditions of Mr. Reynolds' release be amended to reflect that he may travel outside of the Middle District of Alabama, with the

exclusion of the states of Georgia and New York, upon permission and consent of his supervising probation officer.

11. The attorney for the government in this case, Susan Redmond, Esq., does not oppose this motion.

**WHEREFORE**, the defendant respectfully prays that this Motion be granted. A proposed Order is enclosed with this Motion.

Respectfully submitted,

**s/Christine A. Freeman**  
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**CERTIFICATE OF SERVICE**

I hereby certify that on July 12, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:  
Susan Redmond, Esq., Assistant United States Attorney, One Court Square, Montgomery, AL 36104.

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